REMARKS

Claims 11, 19, 22 and 23 have been amended. Claims 7, 10-14, 18-23 and 25 remain for further consideration. No new matter has been added.

The objections and rejections shall be taken up in the order presented in the Official Action.

1-11. Claims 7, 10, 12, 14, 18 and 20 currently stand rejected as allegedly being obvious in view of the combined subject matter in U.S. Patent 6,101,499 to Ford (hereinafter "Ford") and U.S. Patent 6,085,259 to Rode (hereinafter "Rode"). This rejection is improper for several reasons.

CLAIM 7

A Prima Facie Case of Obviousness Has Not Been Established

The Official Action contends that Ford discloses all of the features of claim 7, except the feature of "*manipulating the first address by mathematically summing the first address with a predetermined number, the sum representing the second address.*" (Official Action pg. 3). The Official Action further contends that Rode discloses the feature of claim 7 of "*manipulating a first address of a device by mathematically summing a predetermined number and the first address to derive the second address which is the sum of the first address and the predetermined number.*" (Official Action pg. 3). The Official Action concludes that "*it would have been obvious to one of ordinary skill in the art to incorporate Rode's innovative address generation functionality into Ford's scheme.*" (Official Action pg. 3). The reasons given in the Official Action are that "*as with Rode, Ford is concerned with generating addresses that do not conflict*

with other devices' addresses within a network. Such an implementation would supplement Ford by enabling another method of generating unique addresses for devices in Ford." (Official Action pgs. 3-4).

However, it is respectfully submitted that the Official Action has not made out a *prima facie* showing of obviousness. This is because there is no suggestion or motivation whatsoever in Ford and Rode to combine the teachings of Ford and Rode to meet the features of claim 7. That is, the broad statement in the Official Action mentioned above that both Ford and Rode are concerned with generating addresses that do not conflict with other devices' addresses within a network does not constitute any suggestion or motivation to combine the two references to meet all of the features of claim 7.

Specifically, Rode deals with the problem of how to uniquely address each of a plurality of devices within a <u>single network</u> where every device has the identical address (col. 1, lines 31-39), referred to as a "permanent base address." (See, e.g., col. 1, lines 4-7; col. 2, lines 11-13). Because each device has an identical address as every other device, the problem is that there is no way to distinguish between the devices in the network. (see col. 1, lines 31-39). Rode purports to solve this problem by assigning a single unique address to each device. In particular, Rode adds an offset address to the base address to generate a unique <u>single address</u> for each device within the network. (col. 2, lines 11-13, lines 21-25). As a result, the addressing technique in Rode is such that only a <u>single address</u> is used with each device within the <u>single network</u>.

Rode is in marked contrast to Ford in that Ford deals with the problem of assigning a <u>plurality of addresses</u> to a device for that device to be identified in a corresponding <u>plurality of networks</u>. As alleged in the Official Action, Rode purports to solve this problem by disclosing a <u>plurality of networks</u> and a method for assigning an address for a device within a first network

- 7 -

for unique identification of that device in the first network, and for generating a second address for that same device to uniquely identify that device in the second network. Thus, in Ford, a single network device has a plurality of addresses, whereas in Rode a single network device only has a single address. Thus, the problems addresses in Ford and Rode along with the resulting solutions disclosed in each reference are significant, and not mere trivial, distinctions between the two references. So much so that, as a result, it is respectfully submitted that no reasonable justification exists for the alleged combination of Ford and Rode to meet the features of claim 7. Therefore, it is respectfully submitted that the Official Action has not made out a *prima facie* case of obviousness and, as such, the rejection of claim 7 should be removed and claim 7 should be passed to issuance.

Claim 7 is Patentable Over the Combined References

Assuming, however, for the moment, without admitting that Ford and Rode are even properly combinable, it is respectfully submitted that a combination of Ford and Rode does not meet the all of the features of claim 7. This is because a combination of Ford and Rode does not disclose or suggest any more than Ford alone with respect to the generation of an address for a network device. Ford, as illustrated in FIGS. 5a and 5b and disclosed in col. 10. line 55 to col. 11, line 33 (as contended in the Official Action at page 3), manipulates a first address of each device to derive a second address which uniquely identifies each such device in the second network. One way that Ford accomplishes this is by manipulating an Ethernet address by appending a network identifying portion thereto, as contended in the Official Action on page 3. Thus, Ford discloses the use of two networks where a single device has two separate addresses – one for each network. Ford does so with the goal of minimizing the generation of conflicting addresses for the different network devices (col. 2, lines 43-48).

Further Rode, as contended in the Official Action at page 3, discloses, at col. 2, lines 19-52, a method for calculating an address for a network component as the sum of a base address and an offset address. It is submitted that the use of such a technique as taught by Rode is similar to the technique already disclosed in Ford as discussed above; that is by appending a network identifying portion to an Ethernet address. Thus, it is submitted that Rode does not disclose any more than Ford already discloses or suggests. Because Ford itself does not disclose all of the features of claim 7, as admitted in the Official Action on page 3, it is respectfully submitted that any combination of Ford and Rode would not meet all of the features of claim 7. Thus, it is requested that claim 7 be passed to issuance.

CLAIMS 10 and 12

It is respectfully submitted that the rejection of claims 10 and 12 is moot, since these two claims each depend directly from claim 7, which is patentable for at least the reasons set forth above.

CLAIM 14

Since the Official Action contends that claim 14 is rejected for the same reasons as claim 7, the arguments above with respect to claim 7 are repeated here for claim 14.

A Prima Facie Case of Obviousness Has Not Been Established

That is, the Official Action contends that Ford discloses all of the features of claim 14, except the feature of *"manipulating the first address by mathematically summing the first address with a predetermined number, the sum representing the second address."* (Official Action pg. 3). The Official Action further contends that Rode discloses the feature of claim 14 of

"manipulating a first address of a device by mathematically summing a predetermined number and the first address to derive the second address which is the sum of the first address and the predetermined number." (Official Action pg. 3). The Official Action concludes that *"it would have been obvious to one of ordinary skill in the art to incorporate Rode's innovative address generation functionality into Ford's scheme."* (Official Action pg. 3). The reasons given in the Official Action are that *"as with Rode, Ford is concerned with generating addresses that do not conflict with other devices' addresses within a network. Such an implementation would supplement Ford by enabling another method of generating unique addresses for devices in Ford."* (Official Action pgs. 3-4)

However, it is respectfully submitted that the Official Action has not made out a *prima facie* showing of obviousness. This is because there is no suggestion or motivation whatsoever in Ford and Rode to combine the teachings of Ford and Rode to meet the features of claim 14. That is, the broad statement in the Official Action mentioned above that both Ford and Rode are concerned with generating addresses that do not conflict with other devices' addresses within a network does not constitute any suggestion or motivation to combine the two references to meet all of the features of claim 14.

Specifically, Rode deals with the problem of how to uniquely address each of a plurality of devices within a <u>single network</u> where every device has the identical address (col. 1, lines 31-39), referred to as a "permanent base address." (See, e.g., col. 1, lines 4-7; col. 2, lines 11-13). Because each device has an identical address as every other device, the problem is that there is no way to distinguish between the devices in the network. (col. 1, lines 31-39). Rode purports to solve this problem by assigning a single unique address to each device. In particular, Rode adds an offset address to the base address to generate a unique <u>single address</u> for each device within

the network. (col. 2, lines 11-13, lines 21-25). As a result, the addressing technique in Rode is such that only a single address is used with each device within the single network.

Rode is in marked contrast to Ford in that Ford deals with the problem of assigning a plurality of addresses to a device for that device to be identified in a corresponding plurality of networks. Ford, as contended in the Official Action, purports to solve this problem by disclosing a plurality of networks and a method for assigning an address for a device within a first network for unique identification of that device in the first network, and for generating a second address for that same device to uniquely identify that device in the second network. Thus, in Ford, a single network device has a plurality of addresses, whereas in Rode a single network device only has a single address. Thus, the problems addresses in Ford and Rode along with the resulting solutions disclosed in each reference are significant, and not mere trivial, distinctions between the two references. So much so that, as a result, it is respectfully submitted that no reasonable justification exists for the alleged combination of Ford and Rode to meet the features of claim 14. Therefore, it is respectfully submitted that the Official Action has not made out a *prima facie* case of obviousness and, as such, the rejection of claim 14 should be removed and claim 14 should be passed to issuance.

Claim 14 is Patentable Over the Combined References

Similar to the discussion above with respect to claim 7, assuming, however, for the moment, without admitting that Ford and Rode are even properly combinable, it is respectfully submitted that a combination of Ford and Rode does not meet the all of the features of claim 14. This is because a combination of Ford and Rode does not disclose or suggest any more than Ford alone with respect to the generation of an address for a network device. Ford, as illustrated in FIGS. 5a and 5b and disclosed in col. 10. line 55 to col. 11, line 33 (as contended in the Official

Action at page 3), manipulates a first address of each device to derive a second address which uniquely identifies each such device in the second network. One way that Ford accomplishes this is by manipulating an Ethernet address by appending a network identifying portion thereto, as contended in the Official Action on page 3. Thus, Ford discloses the use of two networks where a single device has two separate addresses – one for each network. Ford does so with the goal of minimizing the generation of conflicting addresses for the different network devices (col. 2, lines 43-48).

Further Rode, as contended in the Official Action at page 3, discloses, at col. 2, lines 19-52, a method for calculating an address for a network component as the sum of a base address and an offset address. It is submitted that the use of such a technique as taught by Rode is similar to the technique already disclosed in Ford as discussed above; that is by appending a network identifying portion to an Ethernet address. Thus, it is submitted that Rode does not disclose any more than Ford already discloses or suggests. Because Ford itself does not disclose all of the features of claim 14, as admitted in the Official Action on page 3, it is respectfully submitted that any combination of Ford and Rode would not meet all of the features of claim 14. Thus, it is requested that claim 14 be passed to issuance.

CLAIMS 18 and 20

It is respectfully submitted that the rejection of claims 18 and 20 is moot, since these two claims each depend directly from claim 14, which is patentable for at least the reasons set forth above.

12-15. Claims 11 and 19 currently stand rejected as allegedly being obvious in view of the combined subject matter in Ford, Rode and the MOST Specification Framework Rev. 1.1 ["MOST spec"] (hereinafter "the MOST Specification").

It is respectfully submitted that the rejection of these claims is moot, since their associated independent claims, claims 7 and 14 respectively, are patentable for at least the reasons set forth above.

16-19. Claims 13 and 21 currently stand rejected as allegedly being obvious in view of the combined subject matter in Ford, Rode, the MOST Specification and U.S. Patent 6,163,843 to Inoue (hereinafter "Inoue").

It is respectfully submitted that the rejection of these claims is moot, since their associated independent claims, claims 7 and 14 respectively, are patentable for at least the reasons set forth above.

20-23. Claim 22 currently stands rejected as allegedly being obvious in view of the combined subject matter in the MOST Specification, Ford and Rode. This rejection is improper for several reasons.

A Prima Facie Case of Obviousness Has Not Been Established

The Official Action contends that the MOST Specification discloses certain features of claim 22, except the feature of "*each of said plurality of multimedia devices has associated therewith a second address that uniquely identifies each said multimedia device in a public network, wherein the second address is derived by mathematically summing a predetermined*

number to the corresponding first address such that each second address is the sum of the first address and the predetermined number and that each second address is different than the corresponding first address." (Official Action pg. 7). Further, the Official Action contends that Ford discloses certain features of claim 22, except the feature of *"mathematically summing to create the second address."* (Official Action pg. 7). The Official Action also contends that Rode discloses the feature of claim 22 of *"manipulating a first address of a device by mathematically summing a predetermined number and the first address to derive the second address which is the sum of the first address and the predetermined number."* (Official Action pgs. 7-8). The Official Action concludes that *"it would have been obvious to one of ordinary skill in the art to incorporate Rode's innovative address generation functionality into Ford's scheme."* (Official Action pg. 8). The reasons given in the Official Action include that *"as with Rode, Ford is concerned with generating addresses that do not conflict with other devices' addresses within a network. Such an implementation would supplement Ford by enabling another method of generating unique addresses for devices in Ford."* (Official Action pg. 8). Also, *"furthermore, Rode discloses an embodiment directed towards generating new network addresses for devices in a vehicle. As the MOST specification is directed towards devices in vehicles as well, it would have been obvious to one of ordinary skill in the art to combine the prior art references to create a dynamic network addressing scheme that enables unique addressing of network devices in vehicles."* (Official Action pg. 8).

However, it is respectfully submitted that the Official Action has not made out a *prima facie* showing of obviousness. This is because there is no suggestion or motivation whatsoever in the MOST Specification, Ford and Rode to combine the teachings of the MOST Specification, Ford and Rode to meet the features of claim 22. That is, the broad statement in the Official

Action mentioned above that both Ford and Rode are concerned with generating addresses that do not conflict with other devices' addresses within a network does not constitute any suggestion or motivation to combine the two references to meet all of the features of claim 22.

Specifically, Rode deals with the problem of how to uniquely address each of a plurality of devices within a single network where every device has the identical address (col. 1, lines 31-39), referred to as a "permanent base address." (See, e.g., col. 1, lines 4-7; col. 2, lines 11-13). Because each device has an identical address as every other device, the problem is that there is no way to distinguish between the devices in the network. (col. 1, lines 31-39). Rode purports to solve this problem by assigning a single unique address to each device. In particular, Rode adds an offset address to the base address to generate a unique single address for each device within the network. (col. 2, lines 11-13, lines 21-25). As a result, the addressing technique in Rode is such that only a single address is used with each device within the single network.

Rode is in marked contrast to Ford in that Ford deals with the problem of assigning a plurality of addresses to a device for that device to be identified in a corresponding plurality of networks. Ford, as contended in the Official Action, purports to solve this problem by disclosing a plurality of networks and a method for assigning an address for a device within a first network for unique identification of that device in the first network, and for generating a second address for that same device to uniquely identify that device in the second network. Thus, in Ford, a single network device has a plurality of addresses, whereas in Rode a single network device only has a single address. Thus, the problems addresses in Ford and Rode along with the resulting solutions disclosed in each reference are significant, and not mere trivial, distinctions between the two references. So much so that, as a result, it is respectfully submitted that no reasonable justification exists for the alleged combination of Ford and Rode to meet the features of claim 22.

Therefore, it is respectfully submitted that the Official Action has not made out a *prima facie* case of obviousness and, as such, the rejection of claim 22 should be removed and claim 22 should be passed to issuance.

Claim 22 is Patentable Over the Combined References

Similar to the discussion above with respect to claims 7 and 14, assuming, however, for the moment, without admitting that the Most Specification, Ford and Rode are even properly combinable, it is respectfully submitted that such a combination does not meet the all of the features of claim 22. This is because a combination of Ford and Rode does not disclose or suggest any more than Ford alone with respect to the generation of an address for a network device. Ford, as illustrated in FIGS. 5a and 5b and disclosed in col. 10. line 55 to col. 11, line 33 (as contended in the Official Action at page 3), manipulates a first address of each device to derive a second address which uniquely identifies each such device in the second network. One way that Ford accomplishes this is by manipulating an Ethernet address by appending a network identifying portion thereto, as contended in the Official Action on page 3. Thus, Ford discloses the use of two networks where a single device has two separate addresses – one for each network. Ford does so with the goal of minimizing the generation of conflicting addresses for the different network devices (col. 2, lines 43-48).

Further Rode, as contended in the Official Action at page 3, discloses, at col. 2, lines 19-52, a method for calculating an address for a network component as the sum of a base address and an offset address. It is submitted that the use of such a technique as taught by Rode is similar to the technique already disclosed in Ford as discussed above; that is by appending a network identifying portion to an Ethernet address. Thus, it is submitted that Rode does not disclose any more than Ford already discloses or suggests. Because Ford itself does not disclose all of the

features of claim 22, as admitted in the Official Action on page 3, it is respectfully submitted that

any combination of the Most Specification, Ford and Rode would not meet all of the features of

claim 22. Thus, it is requested that claim 22 be passed to issuance.

24-27. Claims 23 and 25 currently stand rejected for allegedly being obvious in view of the

combined subject matter disclosed in the MOST Specification, Ford, Rode and Inoue.

It is respectfully submitted that the rejection of claims 23 and 25 is moot, since these two

claims each depend directly from claim 22 which is patentable for at least the reasons set forth

above.

28-35. Claims 7, 10, 12, 14, 18 and 20 currently stand rejected as allegedly being obvious in

view of the combined subject matter in Ford and U.S. Patent 6,917,626 to Duvvury (hereinafter

"Duvvury"). This rejection is improper for several reasons.

Claim 7

A Prima Facie Case of Obviousness Has Not Been Established

The Official Action contends that Ford discloses all of the features of claim 7, except the

feature of "*manipulating the first address by mathematically summing the first address with a*

predetermined number, the sum representing the second address." (Official Action pg. 10). The

Official Action further contends that Duvvury discloses the feature of claim 7 of "*manipulating a*

first address of a device by mathematically summing a predetermined number and the first

address to derive the second address which is the sum of the first address and the predetermined

number." (Official Action pg. 10). The Official Action concludes that "*it would have been*

obvious to one of ordinary skill in the art to incorporate Duvvury's address generation functionality into Ford's scheme." (Official Action pg. 10). The reason given in the Official Action is that "*such a combination would supplement Ford by enabling another method of generating unique addresses for devices.*" (Official Action pg. 10).

However, it is respectfully submitted that the Official Action has not made out a *prima facie* showing of obviousness. This is because there is no suggestion or motivation whatsoever in Ford and Duvvury to combine the teachings of Ford and Duvvury to meet the features of claim 7.

Specifically, Duvvury deals with the problem of how to uniquely address each of a plurality of devices within a <u>single network or cluster</u> in certain circumstances, for example, when a member switch is added to the cluster. As such, the commander switch within the cluster assigns a unique IP address to the added member switch. This is disclosed in numerous locations throughout Duvvury. (See, e.g., Abstract; col. 6, lines 46-56; col. 7, lines 3-6; col. 9, line 61 to col. 10, line 7; col. 14, lines 5-16). As a result, the addressing technique in Duvvury is such that only a <u>single address</u> is used with each device within the <u>single network</u>.

Duvvury is in marked contrast to Ford in that Ford deals with the problem of assigning a <u>plurality of addresses</u> to a device for that device to be identified in a corresponding <u>plurality of networks</u>. Ford, as contended in the Official Action, purports to solve this problem by disclosing a <u>plurality of networks</u> and a method for assigning an address for a device within a first network for unique identification of that device in the first network, and for generating a second address for that same device to uniquely identify that device in the second network. Thus, in Ford, a single network device has a <u>plurality of addresses</u>, whereas in Duvvury a single network device only has a <u>single address</u>. Thus, the problems addresses in Ford and Duvvury along with the

resulting solutions disclosed in each reference are significant, and not mere trivial, distinctions between the two references. So much so that, as a result, it is respectfully submitted that no reasonable justification exists for the alleged combination of Ford and Duvvury to meet the features of claim 7. Therefore, it is respectfully submitted that the Official Action has not made out a *prima facie* case of obviousness and, as such, the rejection of claim 7 should be removed and claim 7 should be passed to issuance.

Claim 7 is Patentable Over the Combined References

Assuming, however, for the moment, without admitting that Ford and Duvvury are even properly combinable, it is respectfully submitted that a combination of Ford and Duvvury does not meet the all of the features of claim 7. This is because a combination of Ford and Duvvury does not disclose or suggest any more than Ford alone with respect to the generation of an address for a network device. Ford, as illustrated in FIGS. 5a and 5b and disclosed in col. 10. line 55 to col. 11, line 33 (as contended in the Official Action at pages 9-10), manipulates a first address of each device to derive a second address which uniquely identifies each such device in the second network. One way that Ford accomplishes this is by manipulating an Ethernet address by appending a network identifying portion thereto, as contended in the Official Action on page 3. Thus, Ford discloses the use of two networks where a single device has two separate addresses – one for each network. Ford does so with the goal of minimizing the generation of conflicting addresses for the different network devices (col. 2, lines 43-48).

Further Duvvury, as contended in the Official Action at page 10, discloses, in FIG. 17 and at col. 16, lines 11-31, a method for calculating an address for a network member by adding the last three bytes of the member switch's MAC address to the number "10.0.0.0." It is submitted that the use of such a technique as taught by Duvvury is similar to the technique already

disclosed in Ford as discussed above; that is by appending a network identifying portion to an Ethernet address. Thus, it is submitted that Duvvury does not disclose any more than Ford already discloses or suggests. Because Ford itself does not disclose all of the features of claim 7, as admitted in the Official Action on page 3, it is respectfully submitted that any combination of Ford and Duvvury would not meet all of the features of claim 7. Thus, it is requested that claim 7 be passed to issuance.

CLAIMS 10 and 12

It is respectfully submitted that the rejection of claims 10 and 12 is moot, since these two claims each depend directly from claim 7, which is patentable for at least the reasons set forth above.

CLAIM 14

Since the Official Action contends that claim 14 is rejected for the same reasons as claim 7, the arguments above with respect to the impropriety of the rejection of claim 7 are repeated here for claim 14.

A Prima Facie Case of Obviousness Has Not Been Established

That is, The Official Action contends that Ford discloses all of the features of claim 14, except the feature of *"manipulating the first address by mathematically summing the first address with a predetermined number, the sum representing the second address."* (Official Action pg. 10). The Official Action further contends that Duvvury discloses the feature of claim 14 of *"manipulating a first address of a device by mathematically summing a predetermined number and the first address to derive the second address which is the sum of the first address*

and the predetermined number." (Official Action pg. 10). The Official Action concludes that "*it would have been obvious to one of ordinary skill in the art to incorporate Duvvury's address generation functionality into Ford's scheme.*" (Official Action pg. 10). The reason given in the Official Action is that "*such a combination would supplement Ford by enabling another method of generating unique addresses for devices.*" (Official Action pg. 10).

However, it is respectfully submitted that the Official Action has not made out a *prima facie* showing of obviousness. This is because there is no suggestion or motivation whatsoever in Ford and Duvvury to combine the teachings of Ford and Duvvury to meet the features of claim 14.

Specifically, Duvvury deals with the problem of how to uniquely address each of a plurality of devices within a <u>single network or cluster</u> in certain circumstances, for example, when a member switch is added to the cluster. As such, the commander switch within the cluster assigns a unique IP address to the added member switch. This is disclosed in numerous locations throughout Duvvury. (See, e.g., Abstract; col. 6, lines 46-56; col. 7, lines 3-6; col. 9, line 61 to col. 10, line 7; col. 14, lines 5-16). As a result, the addressing technique in Duvvury is such that only a <u>single address</u> is used with each device within the <u>single network</u>.

Duvvury is in marked contrast to Ford in that Ford deals with the problem of assigning a <u>plurality of addresses</u> to a device for that device to be identified in a corresponding <u>plurality of networks</u>. Ford, as contended in the Official Action, purports to solve this problem by disclosing a <u>plurality of networks</u> and a method for assigning an address for a device within a first network for unique identification of that device in the first network, and for generating a second address for that same device to uniquely identify that device in the second network. Thus, in Ford, a single network device has a <u>plurality of addresses,</u> whereas in Duvvury a single network device

only has a <u>single address</u>. Thus, the problems addresses in Ford and Duvvury along with the resulting solutions disclosed in each reference are significant, and not mere trivial, distinctions between the two references. So much so that, as a result, it is respectfully submitted that no reasonable justification exists for the alleged combination of Ford and Duvvury to meet the features of claim 14. Therefore, it is respectfully submitted that the Official Action has not made out a *prima facie* case of obviousness and, as such, the rejection of claim 14 should be removed and claim 14 should be passed to issuance.

Claim 14 is Patentable Over the Combined Prior Art References

Similar to the discussion above with respect to claim 7, assuming, however, for the moment, without admitting that Ford and Duvvury are even properly combinable, it is respectfully submitted that a combination of Ford and Duvvury does not meet the all of the features of claim 14. This is because a combination of Ford and Duvvury does not disclose or suggest any more than Ford alone with respect to the generation of an address for a network device. Ford, as illustrated in FIGS. 5a and 5b and disclosed in col. 10. line 55 to col. 11, line 33 (as contended in the Official Action at pages 9-10), manipulates a first address of each device to derive a second address which uniquely identifies each such device in the second network. One way that Ford accomplishes this is by manipulating an Ethernet address by appending a network identifying portion thereto, as contended in the Official Action on page 3. Thus, Ford discloses the use of two networks where a single device has two separate addresses – one for each network. Ford does so with the goal of minimizing the generation of conflicting addresses for the different network devices (col. 2, lines 43-48).

Further Duvvury, as contended in the Official Action at page 10, discloses, in FIG. 17 and at col. 16, lines 11-31, a method for calculating an address for a network member by adding the

last three bytes of the member switch's MAC address to the number "10.0.0.0." It is submitted that the use of such a technique as taught by Duvvury is similar to the technique already disclosed in Ford as discussed above; that is by appending a network identifying portion to an Ethernet address. Thus, it is submitted that Duvvury does not disclose any more than Ford already discloses or suggests. Because Ford itself does not disclose all of the features of claim 14, as admitted in the Official Action on page 3, it is respectfully submitted that any combination of Ford and Duvvury would not meet all of the features of claim 14. Thus, it is requested that claim 14 be passed to issuance.

CLAIMS 18 and 20

It is respectfully submitted that the rejection of claims 18 and 20 is moot, since these two claims each depend directly from claim 14, which is patentable for at least the reasons set forth above.

36-39. Claims 11 and 19 currently stand rejected as allegedly being obvious in view of the combined subject matter in Ford, Duvvury and the MOST Specification.

It is respectfully submitted that the rejection of these claims is moot, since their associated independent claims, claims 7 and 14 respectively, are patentable for at least the reasons set forth above.

40-43. Claims 13 and 21 currently stand rejected as allegedly being obvious in view of the combined subject matter in Ford, Duvvury, the MOST Specification and Inoue.

It is respectfully submitted that the rejection of these claims is moot, since their associated independent claims, claims 7 and 14 respectively, are patentable for at least the reasons set forth above.

44-47. Claim 22 currently stands rejected as allegedly being obvious in view of the combined subject matter in the MOST Specification, Ford and Duvvury. This rejection is improper for several reasons.

A Prima Facie Case of Obviousness Has Not Been Established

The Official Action contends that the MOST Specification discloses certain features of claim 22, except the feature of *"each of said plurality of multimedia devices has associated therewith a second address that uniquely identifies each said multimedia device in a public network, wherein the second address is derived by mathematically summing a predetermined number to the corresponding first address such that each second address is the sum of the first address and the predetermined number and that each second address is different than the corresponding first address."* (Official Action pgs. 13-14). Further, the Official Action contends that Ford discloses certain features of claim 22, except the feature of *"mathematically summing to create the second address."* (Official Action pg. 14). The Official Action also contends that Duvvury discloses the feature of claim 22 of *"manipulating a first address of a device by mathematically summing a predetermined number and the first address to derive the second address which is the sum of the first address and the predetermined number."* (Official Action pg. 14). The Official Action concludes that *"it would have been obvious to one of ordinary skill in the art to incorporate Duvvury's address generation functionality into Ford's scheme."* (Official Action pgs. 14-15). The reasons given in the Official Action include that *"such a*

combination would supplement Ford by enabling another method of generating unique addresses for devices. The combination of Duvvury, Ford and the MOST spec would create a dynamic network addressing scheme that enables unique addressing of network devices in vehicles." (Official Action pg. 15).

However, it is respectfully submitted that the Official Action has not made out a *prima facie* showing of obviousness. This is because there is no suggestion or motivation whatsoever in Ford and Duvvury to combine the teachings of Ford and Duvvury to meet the features of claim 22.

Specifically, Duvvury deals with the problem of how to uniquely address each of a plurality of devices within a <u>single network or cluster</u> in certain circumstances, for example, when a member switch is added to the cluster. As such, the commander switch within the cluster assigns a unique IP address to the added member switch. This is disclosed in numerous locations throughout Duvvury. (See, e.g., Abstract; col. 6, lines 46-56; col. 7, lines 3-6; col. 9, line 61 to col. 10, line 7; col. 14, lines 5-16). As a result, the addressing technique in Duvvury is such that only a <u>single address</u> is used with each device within the <u>single network</u>.

Duvvury is in marked contrast to Ford in that Ford deals with the problem of assigning a <u>plurality of addresses</u> to a device for that device to be identified in a corresponding <u>plurality of networks</u>. Ford, as contended in the Official Action, purports to solve this problem by disclosing a <u>plurality of networks</u> and a method for assigning an address for a device within a first network for unique identification of that device in the first network, and for generating a second address for that same device to uniquely identify that device in the second network. Thus, in Ford, a single network device has a <u>plurality of addresses</u>, whereas in Duvvury a single network device only has a <u>single address</u>. Thus, the problems addresses in Ford and Duvvury along with the

resulting solutions disclosed in each reference are significant, and not mere trivial, distinctions between the two references. So much so that, as a result, it is respectfully submitted that no reasonable justification exists for the alleged combination of Ford and Duvvury to meet the features of claim 22. Therefore, it is respectfully submitted that the Official Action has not made out a *prima facie* case of obviousness and, as such, the rejection of claim 22 should be removed and claim 22 should be passed to issuance.

Claim 22 is Patentable in view of the Combined References

Similar to the discussion above with respect to claims 7 and 14, assuming, however, for the moment, without admitting that the Most Specification, Ford and Duvvury are even properly combinable, it is respectfully submitted that such a combination does not meet the all of the features of claim 22. This is because a combination of Ford and Duvvury does not disclose or suggest any more than Ford alone with respect to the generation of an address for a network device. Ford, as illustrated in FIGS. 3a and 3b and disclosed in col. 2. lines 19-21; col. 3, lines 39-46; col. 8, lines 50-65; and col. 6, lines 54-60 (as contended in the Official Action at page 14), teaches a plurality of devices that have associated therewith a second address that uniquely identifies each multimedia device in a second, public network, where the second address is derived from the corresponding first address (used in the first, private network). In the above-cited locations in Ford, Ford teaches various ways of deriving the second address from the first address, including a method similar to that disclosed in Duvvury, as discussed below.

Duvvury, as contended in the Official Action at page 10, discloses, in FIG. 17 and at col. 16, lines 11-31, a method for calculating an address for a network member by adding the last three bytes of the member switch's MAC address to the number "10.0.0.0." It is submitted that the use of such a technique as taught by Duvvury is similar to the techniques already disclosed in

Ford. Thus, it is submitted that Duvvury does not disclose any more than Ford already discloses or suggests. Because Ford itself does not disclose all of the features of claim 22, as admitted in the Official Action on page 14, it is respectfully submitted that any combination of Ford and Duvvury would not meet all of the features of claim 22. Thus, it is requested that claim 22 be passed to issuance.

48-51. Claims 23 and 25 currently stand rejected for allegedly being obvious in view of the combined subject matter disclosed in the MOST Specification, Ford, Duvvury and Inoue.
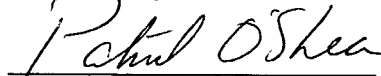
It is respectfully submitted that the rejection of claims 23 and 25 is moot, since these two claims each depend directly from claim 22 which is patentable for at least the reasons set forth above.

For all the foregoing reasons, reconsideration and allowance of claims 7, 10-14, 18-23 and 25 is hereby respectfully requested.

The applicant's PTO-1149 form submitted to the USPTO on April 5, 2005 has not yet been returned to the Applicant. The Applicant respectfully requests an acknowledgment.

If a telephone interview could assist in the prosecution of this application, please call the undersigned attorney.

Respectfully submitted,

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